

of  
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1 to Chrome presumably?

2 A. Yeah, I don't recall a conversation that  
3 we had on this point.

4 Q. I think we can set that exhibit aside.

5 MS. BARKER: And then, Mr. Videographer, if  
6 you would be so kind as to hand the witness the  
7 document that's been marked as Exhibit 11.

8 (Exhibit 11 marked.)

9 THE WITNESS: These ones?

10 THE VIDEOGRAPHER: Yes.

11 THE WITNESS: Okay. 11 is in front of me.

12 Q. (BY MS. BARKER): Okay. Thank you.

13 Directing your attention -- well, I'll represent to  
14 you that this is the copy of the second amended  
15 complaint filed by Mr. Colborn in the Colborn versus  
16 Netflix case that we're here regarding today.

17 Directing your attention to Exhibit B of  
18 that document, which is -- it starts at page 44 of 56  
19 and it's indicated on the bottom folio.

20 A. Okay.

21 Q. And actually, directing your attention  
22 to the next page which is page 45 of 56.

23 A. Okay.

24 Q. Do you recall that in "Making a  
25 Murderer," there was information presented regarding

EXHIBIT

4

1 the search on the Avery property that ultimately led  
2 to the discovery of a key to Teresa Halbach's  
3 vehicle? Correct?

4 A. Correct.

5 Q. And would you agree that testimony by  
6 Mr. Colborn at the Avery criminal trial regarding the  
7 context of his assignment to go to the property on  
8 the date that the key was discovered would be helpful  
9 to viewers in understanding that issue?

10 A. I don't know that to be the case. I  
11 just don't recollect that part of the series.

12 Q. Did you watch all of the final cuts of  
13 Episodes 1 through 10 of "Making a Murderer" before  
14 they were publicly released?

15 A. I did watch those.

16 Q. And were you asked to provide any  
17 approval for those episodes before they were released  
18 publicly?

19 A. I think we -- we signed off on those.

20 Q. And by "we," you're referring to the  
21 same team that had -- we've been reviewing e-mails  
22 between you, Lisa Nishimura, Benjamin Cotner, and  
23 Marjon Javadi?

24 A. Yeah, I don't recall exactly how the  
25 approval worked. I just don't remember back in 2015.

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1 Q. But you were part of the team that  
2 approved it, correct?

3 A. I was.

4 Q. Directing your attention to the next  
5 page -- or, yeah, to page 46 of 56 of the exhibit,  
6 about four paragraphs down, there's a highlighted  
7 paragraph that starts with "I turned around, as I  
8 wasn't very far away."

9 Do you see that?

10 A. I do see that.

11 Q. In reading -- if you could take a moment  
12 and review that paragraph.

13 A. Okay.

14 Q. Would you agree that, assuming that that  
15 paragraph correctly summarizes testimony that Andrew  
16 Colborn provided at the Avery criminal trial, that it  
17 would be important testimony for people to hear in  
18 understanding Mr. An- -- Mr. Colborn's testimony  
19 regarding the participation in the search on the  
20 Avery property that date?

21 MS. WALKER: I'm going to interject an  
22 objection. And the witness is free to answer the  
23 question. But, April -- Ms. Barker, I don't think  
24 there's any foundation laid as to what this is or why  
25 it's highlighted or whether the witness has ever even